

JINA L. CHOI (N.Y. Bar No. 2699718)
SUSAN F. LaMARCA (Cal. Bar No. 215231)
lamarcas@sec.gov
AARON ARNZEN (Cal. Bar No. 218272)
arnzena@sec.gov
VICTOR HONG (Cal. Bar No. 165938)
hongv@sec.gov

Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
44 Montgomery Street, Suite 2800
San Francisco, California 94104
Telephone: (415) 705-2500
Facsimile: (415) 705-2501

DANIEL M. HAWKE (Admitted to D.C. Bar)
701 Market Street
Philadelphia, Pennsylvania 19106

JOSEPH G. SANSONE (Admitted to N.Y. Bar)
3 World Financial Center, Suite 400
New York, New York 10281

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SECURITIES AND EXCHANGE COMMISSION,
Plaintiff,

v.

SALEEM KHAN, AMMAR AKBARI,
ROSHANLAL CHAGANLAL and RANJAN
MENDONSA

Defendants,

and

SHAHID KHAN and MICHAEL KOZA,

Relief Defendants.

Case No. 3:14-CV-02743-EMC

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
TO EXTEND THE TIME FOR
DEFENDANTS TO ANSWER THE
COMPLAINT**

1 WHEREAS, on June 13, 2014, the U.S. Securities and Exchange Commission (the
2 “Commission”) filed the Complaint against Defendants Saleem Khan, Ammar Akbari, Roshanlal
3 Chaganlal and Ranjan Mendonsa (collectively, the “Defendants”), and the Commission has since
4 filed proof of service, or waiver of service, with respect to all of the Defendants;

5 WHEREAS, pursuant to prior Stipulations entered between the Commission and each of the
6 Defendants separately extending the time to file an Answer to the Complaint, each of the Defendants
7 are currently required to file an Answer on or before September 11, 2014;

8 WHEREAS, no other time modifications have been made in this case;

9 WHEREAS, pursuant to the Court’s Case Management Conference Order entered July 21,
10 2014 (Dkt No. 21), the parties are required to attend the initial Case Management Conference in this
11 matter on September 18, 2014 at 9:30 a.m., and to file a joint Case Management Statement one week
12 prior to the CMC;

13 WHEREAS, counsel for the Commission has a conflict with the currently scheduled initial
14 CMC, due to a previously scheduled annual conference that takes place in Washington, D.C.;

15 WHEREAS, counsel for the Commission has been speaking with counsel for certain of the
16 defendants to determine whether there may be any opportunity for an early resolution of this matter;

17 ACCORDINGLY, it is HEREBY STIPULATED by and between the undersigned parties
18 that:

- 19 1. The Parties jointly request that each of the above dates be extended for approximately
20 30 days, resulting in:
 - 21 a. The initial Case Management Conference shall be moved to Thursday, October 16,
22 2014, at 9:30 a.m. (or as soon thereafter as the Court’s schedule shall allow);
 - 23 b. The initial Case Management Statement shall be filed no later than October 9,
24 2014;
 - 25 c. The Defendants’ Answers to the Complaint are each due to be filed on or before
26 October 13, 2014;
- 27 2. In all other respects aside from these deadlines, the parties shall adhere to the terms of
28 the Court’s Case Management Conference Order and their respective Stipulations.

IT IS SO STIPULATED.

DATED: September 3, 2014

/s/

SECURITIES AND EXCHANGE
COMMISSION

Susan F. LaMarca (SBN 215231)

Aaron Arnzen (SBN 218272)

Victor W. Hong (SBN 165938)

44 Montgomery Street, Suite 2800

San Francisco, CA 94104

Telephone: 415-705-2500

/s/

LAW OFFICES OF BRIAN P. BERSON

Brian P. Berson (SBN 130249)

235 Montgomery Street, Suite 625

San Francisco, CA 94104

Telephone: 415-788-2707

Specially Appearing for Defendant Ammar
Akbari

/s/

BINGHAM MCCUTCHEN LLP

Charlene S. Shimada

Three Embarcadero Center

San Francisco, CA 94111-4067

415-393-2000

Counsel for Defendant Ranjan Mendonsa

/s/

SUGARMAN & CANNON

Christopher J. Cannon

180 Montgomery Street

Suite 2350

San Francisco, CA 94104

415-362-6252

Counsel for Defendant Saleem Khan

/s/

Roshanlal Chaganlal

(Pro Se)

2183 Forino Drive

Dublin, CA 94568

~~[PROPOSED]~~ ORDER

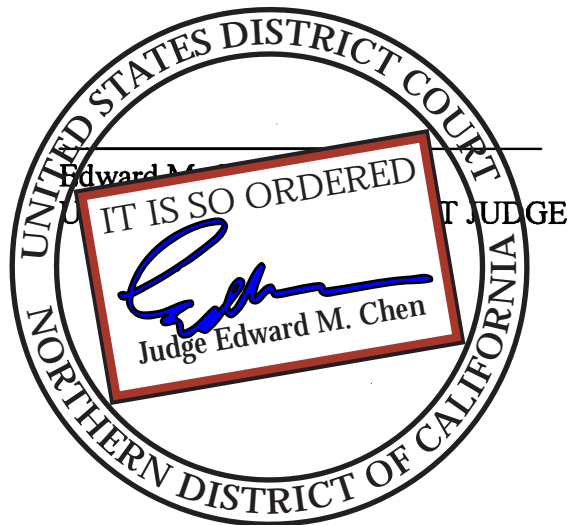
Good cause appearing from the above Stipulation, the requested extension of approximately 30 days for the Parties to appear before the Court for the initial Case Management Conference and related filings, and extending the time for each of the Defendants to file an Answer to the Complaint, is hereby GRANTED.

IT IS HEREBY ORDERED THAT:

- a. The initial Case Management Conference shall be moved to Thursday, October 16, 2014, at 9:30 a.m. (or as soon thereafter as the Court's schedule shall allow);
- b. The initial Case Management Statement shall be filed no later than October 9, 2014;
- c. The Defendants' respective Answers to the Complaint are each due to be filed on or before October 13, 2014.

IT IS SO ORDERED.

DATED: 9/4/14



ATTESTATION

I, Susan F. LaMarca, am the ECF User whose identification and password are being used to file the Stipulation and Proposed Order. I hereby attest that each of the above parties or their representatives concurs in this filing.

Dated: September 3, 2014

/s/
Susan F. LaMarca
Attorney for Plaintiff
SECURITIES AND EXCHANGE COMMISSION

CERTIFICATE OF SERVICE

I, Janet Bukowski, am a citizen of the United States, over 18 years of age and not a party to this action. On September 3, 2014, I served the following documents:

- STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE AND TO EXTEND THE TIME FOR DEFENDANTS TO ANSWER THE COMPLAINT

via US MAIL, to the following:

Brian P. Berson, Esq.
Law Offices of Brian P. Berson
235 Montgomery Street, Suite 625
San Francisco, CA 94104-2909
Specially Appearing for Defendant Ammar Akbari

Roshanlal Chaganlal
2183 Forino Drive
Dublin, CA 94568

the following defendants were served via the Court's CM/ECF system:

Christopher Cannon, Esq.
Sugarman & Cannon
180 Montgomery Street, Suite 2350
San Francisco, CA 94104
Attorney for Defendant Saleem Khan

Charlene S. Shimada, Esq.
Bingham McCutchen LLP
Three Embarcadero Center
San Francisco, CA 94111-4067
Attorney for Defendant Ranjan Mendonsa

I declare under penalty of perjury that the statements made above are true and correct.

Executed in San Francisco, California on September 3, 2014.


Janet Bukowski